

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

KAJEET, INC.,  
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Plaintiff,  
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LIGHTSPEED SOLUTIONS, LLC  
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Defendant.

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR INTRA-DISTRICT  
TRANSFER OF VENUE TO THE AUSTIN DIVISION OF THE WESTERN DISTRICT  
OF TEXAS**

Plaintiff Kajeet, Inc. (“Kajeet”) opposes Defendant Lightspeed Solutions, LLC’s (“Lightspeed”) Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas because of the two other related cases that Kajeet has currently pending in the Waco Division. Kajeet has filed patent infringement cases involving the same patent-in-suit here against two other companies in this Division. See *Kajeet, Inc. v. Jamf Software, LLC*, Civil Action No. Case No. 6:20-cv-0302-ADA and *Kajeet Inc. v. Asavie Technologies Limited*, Civil Action No. 6:20-cv-705-ADA.

In its Motion, Defendant Lightspeed Solutions, LLC (“Defendant”) asks the Court to transfer this case to the Austin Division but also requests that this Court maintain the case on its docket. Based on the facts presented in Lightspeed’s Motion, Kajeet would not otherwise oppose the intra-district transfer. However, given that this case along with the two others involving the same patent will be maintained on this Court’s docket, for purposes of judicial economy it would make sense for this case to stay in the Waco Division. Doing so would avoid inefficiencies such as additional or separate hearings on common matters including claim construction and

discovery issues. As the Court will conduct separate trials for the cases, Kajeet is not opposed to this case being tried in the Austin Division.

Accordingly, Kajeet respectfully requests that the Court deny the Motion for Intra-District Transfer and keep this case here in the Waco Division up until the time of trial.

Dated: September 22, 2020

/s/ Jonathan T. Suder

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**ATTORNEYS FOR KAJEET, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above document was served on all counsel of record via email on September 22, 2020.

/s/ Jonathan T. Suder